

UNITED STATES DISTRICT COURT      FILED  
DISTRICT OF MASSACHUSETTS      IN CLERK'S OFFICE

UNITED STATES OF AMERICA )  
 )  
 v. ) CRIMINAL NO. 05-30002-MAP  
 ) U.S. DISTRICT COURT  
 ) DISTRICT OF MASS  
 )  
 FRANK DEPERGOLA, and )  
 ARMANDO BOTTA, )  
 )  
 Defendants. )

GOVERNMENT'S MOTION TO UNSEAL AND SUBMIT REDACTED INDICTMENT


The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, moves this Court, pursuant to Local Rule 7.2, to unseal the Indictment in the above referenced case.

The government further requests that the Indictment be redacted to exclude the name of the victim. As grounds for this motion, the government states that all defendants have been arrested and therefore there is no reason to further seal the Indictment. The reason for providing redacted copies is to protect the ongoing investigation as well as to protect the privacy interests of any victims and government witnesses.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By :

  
Ariane D. Vuono  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts  
March 2, 2005

I, Ariane D. Vuono, Assistant U.S. Attorney, do hereby  
certify that I have served a copy of the foregoing by mail on all  
counsel of record.

A handwritten signature in black ink, appearing to read "Ariane D. Vuono", is written over a horizontal line.

Ariane D. Vuono  
Assistant U.S. Attorney